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Via ECF

February 5, 2019

Honorable Debra Freeman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 17A
New York, New York 10007

Re: *Carlos M. Salas et al. v. Peter Salas et al.*
Case No. 16-cv-02248

Dear Magistrate Judge Freeman:

Our firm represents Plaintiffs Carlos M. Salas and Ada Cristina Salas in the above-referenced matter and writes in opposition to the letter from Defendants' counsel dated February 1, 2019 requesting a 14-day extension to February 22, 2019 to file Defendants' response to Plaintiffs' Proposed Findings of Fact and Conclusions of Law.

Plaintiffs' Proposed Findings of Fact are based on the trial record, and at this post-trial stage, Defendants' counsel should be familiar with the facts set forth therein. Furthermore, Defendants' response is not an opportunity for Defendants to reargue their position or to proffer new arguments, but to address new issues that have been raised by Plaintiffs. In that regard, Defendants' counsel has not pointed to any in his letter. Defendants' counsel has not provided any significant reason why he requires a month to submit Defendants' response.

Based on the foregoing, Plaintiffs respectfully request that the Court deny Defendants' application for an extension of time to file their response to Plaintiffs' Proposed Findings of Fact and Conclusions of Law.

Respectfully submitted,

/s/ Elliot J. Coz

Elliot J. Coz

cc: Daniel A. Osborn, Esq. (via ECF)
Lindsay M. Trust, Esq. (via ECF)